



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 29 2013

REPLY TO THE ATTENTION OF:

E-19J

Stan Austin
Superintendent
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, Ohio 44141

**RE: Final Environmental Impact Statement, Cuyahoga Valley National Park Trail
Management Plan, Brecksville, Ohio – CEQ# 20130111**

Dear Mr. Austin:

The U.S. Environmental Protection Agency (EPA) has reviewed the National Park Service's (NPS) Final Environmental Impact Statement (Final EIS) for the above-mentioned project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council of Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.


EPA assigned a rating of "Lack of Objections" (LO) to the Draft EIS in our August 15, 2012 letter. The Draft EIS analyzed impacts associated with seven action alternatives. The Final EIS indicates that Alternative 5 was selected for implementation.

The NPS has satisfactorily addressed the following issues identified in our Draft EIS letter. These include: 1) new and expanded construction which follows Leadership in Energy and Environmental Design (LEED) guidelines, 2) use of permeable or porous pavement technology for new parking lots and other paved surfaces, 3) use of vegetated buffers and inlets in and around paved areas, 4) delineation of wetlands during the growing season, 5) utilization of boardwalk trail systems for all stream crossings and wetland areas; such boardwalk crossings should have posts that span the entire stream and be kept above the ordinary high water mark of the stream, 6) maintenance of a protected buffer region of 50 feet around wetlands and streams; such that there are no new campsites, parking facilities, or other structures within the protected buffer region, 7) construction of wetland boardwalks during winter if feasible, and 8) minimization of the width of temporary access roads for construction access.

Subsequent to receiving the Final EIS, Lynn Garrity of your staff confirmed by phone with Bob O'Brien of my staff that NPS intends to implement additional best management practices (BMPs) that we recommended in our Draft EIS comment letter. These include but are not limited to the following: 1) use easily-removed materials for construction of temporary access roads (e.g., swamp/timber mats) in lieu of materials that sink (e.g., stone, rip-rap, wood chips) and 2) use swamp/timber mats or other alternative matting to distribute the weight of the construction equipment; this will minimize soil rutting and compaction. EPA commends NPS. These additional BMPs should be noted in the Record of Decision.

We appreciate the opportunity to comment on this project. If you have any questions, please do not hesitate to call me or Robert O'Brien of my staff at (312)886-3283 or obrien.robert@epa.gov.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

cc: Nicholas Chevance, Midwest Regional Environmental Coordinator, National Park Service